

# CAROLINA FAMILY HEALTH CENTERS, INC.

## PROCEDURE

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**TITLE:** EXEC-306.02 Accommodating Persons with Disabilities

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**EFFECTIVE DATE:** April 2013

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**SECTION:** Executive

**REFERENCE POLICY:** EXEC-306 Nondiscrimination Position Statement

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**RESPONSIBLE CHIEF OF STAFF:** Chief Executive Officer

**RESPONSIBLE COMMITTEE:** Central-Executive

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**REVIEWED:** 08/16, 07/18, 04/03/2023, 02/03/2025

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### I. PURPOSE

The purpose of this document is to outline Carolina Family Health Centers, Inc.'s (CFHC, Inc.) procedure to provide accessible programs, services, activities, and facilities to disabled individuals.

### II. PROCEDURE

CFHC, Inc. and all of its programs and activities are accessible to and useable by disabled persons, including persons who are deaf, hard of hearing, or blind, or who have other sensory impairments. CFHC, Inc. provides reasonable modification procedures designed to ensure that qualified individuals with disabilities may obtain reasonable modifications when appropriate. Qualified individuals with disabilities may, at any time, request that CFHC, Inc. reasonably modify, change, except, or adjust a rule, policy, practice, or service when necessary so that CFHC, Inc. does not unlawfully deny the individual equal access to programs, activities, services, and other benefits.

Any measures, modifications, or aids provided to disabled individuals are provided at no additional cost.

#### **Request for Reasonable Accommodation**

If patient requests a reasonable modification to access our programs, activities, services, or other benefits, staff provides the modification to the individual if the requested modification does not result in a fundamental alteration to the program or activity.

CFHC, Inc. has taken a proactive approach to identifying accessibility needs of the patient population such as accessible facilities, provision of auxillary aids, and availability of on-demand high-quality video American Sign Language interpreting services.

If a patient's request for accommodations cannot be made at the time of service, the patient is asked to complete the *Request for Accommodations* form (see attachment). Staff may assist the patient in completing the form or the patient can be given the form to complete at home, with instructions to mail or email the form back to the office. All completed forms are sent to the Chief Compliance Officer. The Chief Compliance Officer or his/her designee reviews the form and contacts the patient or the patient's caregiver to review the requested accommodation. The

accommodation is reviewed with the Central-Compliance Committee to determine if the accommodation is reasonable. The accommodation is documented in the patient's medical record and the patient's PCP is notified of such requests.

In the event a CFHC, Inc. staff receives a request for a modification and he/she is unsure if CFHC, Inc. can provide such accommodation, he/she is directed to contact the Chief Compliance Officer which serves as the Section 1557 Coordinator for the organization. The Chief Compliance Officer's contact information can be found by searching the employee directory found on the "CFHC Intranet."

CFHC, Inc. employees who believe they need a reasonable accommodation to perform an essential function of their job is directed to contact the Director of Human Resources and follow HR-103.01 Americans with Disabilities Act – Reasonable Accommodation.

#### *Accessible Facilities*

CFHC, Inc. has taken measures to ensure facilities are accessible. Accessibility features include:

- Convenient off-street parking designated specifically for disabled persons
- Curb cuts and ramps between parking areas and building
- Level access into first floor level with elevator access to other floors
- Fully accessible offices, meeting rooms, bathrooms, public waiting areas, and patient treatment areas

#### *Provision of Auxillary Aids*

To address the comprehensive needs of disabled patients, CFHC, Inc. provides other auxiliary aids and services to patients. Auxiliary aids and services may include, but are not limited to:

- Qualified interpreters or remote audio and/or video interpreting
- Note takers, real-time computer-aided transcription services, written material, telephone handset amplifiers, and assistive listening devices
- Qualified readers, taped texts, audio recordings, braille material and displays, screen reader software, and large printed material
- Acquisition and modification of equipment and devices
- Readers and taped material for the blind and large print materials for the visually impaired
- Flash cards, alphabet boards, or other communication boards
- Assistive devices for persons with impaired manual skills

#### *Availability of American Sign Language Interpreters*

CFHC, Inc. provides accurate and timely communication services free of charge to hearing-impaired individuals. The service protects the privacy and independence of the individual. Communication with the hearing-impaired individual can be accomplished through writing, if appropriate; however, for most patients, communication is accomplished through the use of on-demand high-quality video American Sign Language interpreting services.

In order to promptly identify the hearing-impaired patient's communication needs, staff records the patient's communication needs upon registration as outlined in additional CFHC, Inc.

policies and procedures. The practice of recording this information provides CFHC, Inc. with information to predictably and efficiently identify hearing-impaired patients for two reasons:

- The Front Office Associate (at the time of appointment scheduling or arrival at the facility) notifies the hearing-impaired patient of the availability of communication assistance services.
- Based on the collective communication needs, CFHC, Inc. periodically evaluates and modifies its policies, practices, and procedures to avoid discrimination on the basis of disability.

CFHC, Inc. staff who identify individuals that require the use of American Sign Language interpreting services are responsible for connecting to the video interpreting services.

Companions, such as family members (including minors), friends, advocates, case managers and other people who are at the facility to support the patient (who are not qualified sign language interpreters) are not considered appropriate or qualified interpreters. Patients may request to use a companion for the primary communication; companions may only be used if specifically requested by the patient and only after CFHC, Inc. staff has communicated to the patient, through the video American Sign Language Interpreting service, that CFHC, Inc. is willing to provide a qualified interpreter to the patient free of charge.

However, to ensure accurate interpretation and mitigate risk to CFHC, Inc. and its staff, CFHC, Inc. employees have the right to use CFHC, Inc. approved video interpreting service in the presence of the patient's companion.

Only in an emergency involving and imminent threat to the safety or welfare of an individual or the public where there is no qualified interpreter for the individual can non-qualified interpreters be used to provide support to the patient.

Staff communicates with hearing-impaired patients who do not use sign language through written language by exchanging written notes.

### **Visually Impaired Assistance**

To address the needs of visually-impaired patients, staff asks patients if they need assistance in reading any forms or other documents when patients present for services. If the patient acknowledges they need assistance, the staff reads the form or document, in its entirety, to the patient. Additionally, staff ask the patient if he/she requires assistance throughout the facility. If the patient acknowledges they need assistance, the staff walks with the patient through the facility.

### **Likely Need for Assistance**

If an individual's disability is apparent or otherwise known, CFHC, Inc. staff should ask the individual if they need a reasonable modification to have meaningful access to our programs, activities, services, and other benefits.

Staff documents the preferred method of communication or auxiliary aid used in the electronic health record.

### **III. ATTACHMENT**

- *Request for Accommodations*